

## REMARKS

By this amendment, Applicant has amended claims 19, 32, and 38. As a result, claims 19-38 are pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicant does not acquiesce in the correctness of the objections and rejections and reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Final Office Action dated September 30, 2003, claims 19-20, 22, 24-31, and 32-37 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,933,816 (Zeanah et al.) in view of U.S. Patent No. 6,006,229 (Schmidt et al.); and claims 21, 23, and 38 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Zeanah et al. in view of Schmidt et al., and further in view of the text book "Database System Concepts" (Korth et al.).

In an After Final Response dated December 1, 2003, Applicant presented various arguments in response to the rejections. In an Advisory Action dated December 30, 2003, the Office states that the arguments presented are not persuasive and includes a requirement for information on an existing CICS OS/2 Version 2 Developer Kit, 1st edition (May 1994). In response to the requirement for information, Applicant was unable to locate the requested developer kit, but provided the Office with electronic documentation on CICS OS/2 Version 2, which was received by the Office on February 2, 2004.

Despite several inquiries by Applicant's representative, the Office did not attempt to review the documentation until March 24, 2004. On this date, the Examiner indicated in a

telephone conversation with Applicant's representative that he was unable to install the required software, and therefore could not view the documentation. Applicant emphasizes that the documentation is intended to be viewed in electronic format. However, in an attempt to have the documentation considered, Applicant has herein included a hard copy of the documentation and requests prompt consideration thereof.

By this amendment, Applicant has amended claims 19, 32, and 38 to further define the processing performed by the main module. In particular, the main module processes both a banking transaction and an undo request for a previously processed banking transaction. To this extent, based on a message received from a terminal, at least one of the application transactions is initiated to either process the transaction or undo the transaction. Zeanah et al. is devoid of any such suggestion or feature. Further, Schmidt et al. fails to cure this defect. As a result, Applicant respectfully requests withdrawal of the rejections.

Applicant again includes herein the various arguments included in the After Final Response dated December 1, 2003. Applicant notes that the Office failed to particularly address these arguments in the Advisory Action. As a result, Applicant respectfully requests that the Office address each of these arguments so that a proper response can be prepared by Applicant.

With regard to the application transactions and knowledge blocks claimed in claims 19, 32, and 38, the Office alleges that Schmidt et al. discloses the claimed feature of an application transaction (knowledge block) that undoes a unique banking transaction (operation) after the unique banking transaction (operation) has been mistakenly processed. Applicant respectfully traverses this rejection. In particular, as the Office states, Schmidt et al. discloses a rollback operation "to undo the partially finished but failed transaction." Col. 5, lines 22-23. As

Applicant similarly argued with respect to Freund previously, Schmidt et al. fails to disclose a system in which each application transaction (knowledge block) both processes and undoes a unique transaction (operation). Still further, while Schmidt et al. discusses undoing the effects of unsuccessful transactions, this discussion in no way suggests that the ability to process and undo a banking transaction (operation) that has been mistakenly processed be included in an application transaction (knowledge block). This capability is unique to the claimed invention, and beneficially includes in a single module the necessary functions for processing a transaction and undoing its effects should it be determined that it has been mistakenly processed.

In particular, Schmidt et al. provides a solution that maintains a log file for Xbase commands on an Xbase server. Applicant notes that the Xbase server does not process and undo banking transactions (operations), rather it performs the low level data management for commands received from an application program. As a result, Schmidt et al. fails to teach an application transaction (knowledge block) that processes and undoes a unique banking transaction as in the claimed invention.

Further, in Schmidt et al., the effects of the Xbase commands are not made permanent in Xbase file set until a commit is received. If a rollback is received, then the Xbase server resets the log file, thereby resetting the data as it was at the start of the transaction. In this manner, Schmidt et al. provides a solution for undoing “a partially finished but failed transaction.” In sharp contrast, as previously stated with respect to Freund and not addressed by the Office, the claimed invention includes the ability to undo a banking transaction (operation) that has been mistakenly processed. For example, under the claimed invention, an application transaction that implements a deposit transaction also implements a withdrawal that undoes the deposit

transaction. In this manner, if the deposit transaction is mistakenly processed, the application transaction can undo the deposit transaction by processing a withdrawal. The discussion in Schmidt et al. does not suggest this feature, let alone combining the undo functionality in an application transaction that also processes the banking transaction. As a result, Zeanah et al. and Schmidt et al. fail to disclose this feature of the claimed invention.

With regard to the main module as claimed in claims 19, 32, and 38, the Office alleges that Applicant did not respond to the Office's previous rejection. In sharp contrast, Applicant presented arguments with regard to this rejection beginning on page 12 of the previous response dated April 28, 2003. In particular, Applicant discussed in detail that the functionality provided by the session controller component in Zeanah et al. is unrelated to the functionality provided by Applicant's claimed main module.

The Office then reiterates that Zeanah et al. teaches a system for providing financial services that can be written in an object oriented programming language. Based on this alone, the Office concludes that Zeanah et al. teaches the claimed main module. Applicant respectfully disagrees with this conclusion. Systems implemented using object oriented programming can be implemented using a variety of combinations of modules that each provide specific functionality. Applicant's particular claimed combination of modules is clearly distinct from that disclosed in Zeanah et al. To this extent, Applicant's claimed combination of modules provides for increased modularity and portability than that provided by Zeanah et al. This modularity and portability is not an inherent aspect of object oriented programming, rather it is a by-product of the particular selection and implementation of the modules. Object oriented programming merely facilitates the placement of functions into modules.

Further, in making the rejection, the Office fails to provide any support for its conclusion. In particular, the Office alleges that “the *session controller component* 131 instantiates various components based upon a banking transaction.” Page 5 (emphasis added). However, in support of this conclusion, the Office cites a portion of Zeanah et al. that states that “[a] *navigation shell component* [82] notifies the remote device of the list of available functions, such as cash withdrawal or bill payment...” Page 6, citing col. 4, lines 24-28 of Zeanah et al. (emphasis added). As a result, the Office cites functionality provided by a different component (i.e., navigation shell component 82) in support of its conclusion that the session controller component 131 is analogous to the claimed main module.

With regard to the centercut control module and online banking module as claimed in claims 26-27 and 33-34, Applicant reiterates that the claimed invention is not the functionality provided by the centercut control module and online banking module, but a particular combination of modules for providing the functionality that the Office cites. However, the Office again cites references that disclose only the functionality and/or alleges that the functionality is known while failing to cite any reference that allegedly discloses the claimed modules for implementing the functionality. In this regard, Applicant respectfully submits that the Office misinterprets the claimed invention. By providing a unique combination of modules, the claimed invention provides a benefit over the prior art in terms of portability and reusability, much in the same manner that a machine that provides known functionality in a more efficient manner may be patentable despite the fact that the functionality is known.

With regard to the claimed system processing functions, database interface module, and file interface module, Applicant notes that Zeanah et al. fails to disclose the claimed feature of

providing a platform independent interface between the business platform and a server, between the main module and a database, and between the main module and a file system, respectively. In particular, the claimed invention provides these modules in order to isolate changes that are necessary when one or more of the server, database, and file system are changed from one implementation to the next. As a result, the claimed business platform can be implemented on any system without modification. In sharp contrast, “the operating system for [Zeanah et al.’s] delivery system 12 is preferably Microsoft’s Windows NT but may alternatively operate on other operating systems, such as a Macintosh or a UNIX operating system.” Col. 29, lines 2-5. As a result, Zeanah et al.’s system is designed to be implemented on a particular operating system, and does not provide the isolated functions that would enable portions of the system to be implemented on any operating system without modification. In support of its conclusion, the Office cites portions of Zeanah et al. that address situations in which the delivery system communicates with various other systems. However, this discussion is unrelated to, and fails to disclose the claimed invention in which the business platform can be implemented on various systems without modification. With further regard to the claimed file interface module, the Office cites a portion of Zeanah et al. that apparently discusses the use of various files for configuring operation of the system (e.g., rules, phrases, etc.), and not isolation from different file systems (e.g., UNIX vs. Windows).

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JL W. LaBatt' with a stylized flourish at the end.

John W. LaBatt, Reg. No. 48,301  
Hoffman, Warnick & D'Alessandro LLC  
Three E-Comm Square  
Albany, NY 12207  
(518) 449-0044 - Telephone  
(518) 449-0047 - Facsimile

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